

1 **Hearing Date: January 15, 2020**

2 **Time: 1 pm**

3 **Location: Port Orchard**

4 **Response must be filed by: January 8, 2020**

5 **HONORABLE CHRISTOPHER M. ALSTON**

6  
7 **UNITED STATES BANKRUPTCY COURT**  
8 **FOR THE WESTERN DISTRICT OF WASHINGTON**

9 **IN RE:**

10 **EAGLE HARBOR HOLDINGS, LLC**  
11 **Debtor(s).**

**NO. 17-10722**

**MOTION TO ABANDON PROPERTY**

12 Comes now, John S. Peterson, Trustee, and moves the Court for an order abandoning  
13 property described as three patents of Eagle Harbor Holdings, LLC: #9,292,017, #9,293,928 and  
14 #9,620,987. This motion is based on 11 USC 554, the declaration attached and the files and  
15 records herein.  
16

17  
18 DATED this 14th day of December, 2019.

/S/ JOHN S. PETERSON

JOHN S. PETERSON

Trustee

20 **DECLARATION**

21 JOHN S. PETERSON, declares as follows: I am the trustee in this case and am moving  
22 to abandon to the debtor's interest in property described as three patents: #9,292,017, #9,293,928  
23 and #9,620,987. Patent #9,292,017 is the sole member of the "017 Family of Patents" held by  
24 the debtor LLC and is described as "System and method for real-time guidance and mapping of a  
25 tunnel boring machine and tunnel". Patent #9,293,928 is a member of the "928 Family of  
26 Patents" and is described as a "System and method for a dynamically configurable power  
27 distribution control and management system". Patent #9,620,987 is also a member of the "928  
28 Family of Patents" and is described as a "System and method for a dynamically configurable

Motion  
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**JOHN S. PETERSON**  
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1 power distribution control and management system”. Further descriptions and information is  
2 available upon request.

3  
4 At the time of filing, the debtor was the holder of over 40 patents in 11 patent families  
5 primarily related to communication and sensor technologies related to connected cars, auto  
6 infotainment, self-driving cars, etc. The Trustee and counsel were involved in extensive efforts  
7 to market and liquidate the patents. A large portion of the patents were collateral for a loan held  
8 by Northwater Intellectual Property Fund L.P. 2 and were foreclosed on. The balance of the  
9 portfolio was marketed and sold to AutoBrilliance LLC, pursuant to court order (Docket #90).  
10

11  
12 The three patents covered by this motion were not sold to AutoBrilliance, LLC, and no  
13 interest in the three patents has been expressed by any other party to date. Licensing fees are due  
14 to the U.S. Patent and Trade Office on two of the patents in the 1<sup>st</sup> Quarter of 2020. The  
15 bankruptcy estate doesn’t have funds sufficient to pay the license fees.  
16

17 I have determined that the three patents are of inconsequential value and benefit to the  
18 estate. For that reason, I request authority to abandon them.  
19

20 I declare the foregoing is true and correct under the laws of the United States of America.

21 Signed this 14th day of December, 2019.

/S/JOHN S. PETERSON  
JOHN S. PETERSON